

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA

In re:	*	CHAPTER 13
	*	
LESLIE McDANIEL,	*	CASE NO. 12-41231-JTL
	*	
Debtor,	*	JUDGE LANEY

LESLIE McDANIEL, Individually and as	*	
Representative of her Bankruptcy Estate,	*	
	*	
Plaintiff,	*	ADVERSARY PROCEEDING
	*	
vs.	*	NO. 13-04013
	*	
SUNTRUST BANK, SUNTRUST	*	
MORTGAGE, INC., McCALLA	*	
RAYMER, LLC, FOXFIRE ACRES, INC.,	*	
THE UNITED STATES by and through the	*	
THE INTERNAL REVENUE SERVICE,	*	
THE STATE OF GEORGIA (Represented	*	
by the DEPARTMENT OF REVENUE), THE	*	
GROGAN GROUP, LLC d/b/a GROGAN &	*	
GROGAN, and THE COLUMBUS	*	
CONSOLIDATED GOVERNMENT,	*	
	*	
Defendants.	*	

RESPONSE TO MOTION FOR PROTECTIVE ORDER AND MOTION TO QUASH

Comes now Plaintiff and Debtor and responds to the Motion for Protective Order and Motion to Quash filed by the Columbus Consolidated Government (“City”), for itself and for its Mayor and Tax Commissioner, and says that same should be denied. Every procedural accommodation has been made or offered to the City so that there is no reason, procedurally, that the depositions should not be taken. The essence of the City’s opposition is that it (and its Mayor and Tax Commissioner) should be exempt from deposition, because it is inconvenient. The witnesses have information that is relevant or reasonably calculated to lead to information that is

relevant and the depositions should be permitted. Plaintiff relies on the Affidavit served herewith and on the arguments of law to be made in open Court when this matter is to be heard.

Respectfully Submitted, this 19th Day of December, 2013,

/s/ Fife M. Whiteside

Fife M. Whiteside,
For the Plaintiff
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